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BROWN AND  
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ORIGINAL

Mr. Donald Webster  
USEPA Region IV  
Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

CM

RE: ~~Interim Measures~~ Progress Report  
Grenada Manufacturing, LLC. – Grenada, Mississippi  
EPA ID No. MSD 007 037 278

Dear Mr. Webster:

This letter serves as the next Interim Measures Progress Report for the referenced site. The United States Environmental Protection Agency (USEPA) requested that Grenada Manufacturing transmit such progress reports on a semi-annual basis until such time that a Corrective Measures Study (CMS) Report is completed for the site. As discussed below, the CMS has been completed. However, Grenada Mfg. and ArvinMeritor have elected to provide you with this additional report summarizing the status of the various activities completed or in progress at the site.

#### **Corrective Measures Study (CMS)**

A Corrective Measure Study (CMS) has been completed for the Grenada Mfg. site in accordance with the CMS Work Plan (October 2002), which had been given conditional approval by the USEPA. The CMS Report was transmitted to the USEPA on August 15, 2003. Unconditional approval of the CMS Report was received in a letter from the USEPA dated September 23, 2003. As stipulated in the September 23 USEPA letter, Grenada Mfg. and ArvinMeritor have begun to implement the corrective measures in accordance with the schedule outlined in Section 5 of the CMS Report.

#### **Permeable Reactive Barrier (PRB)**

The completed *Design Basis Report* was transmitted to the USEPA and MDEQ in April 2003. The MDEQ has reviewed the document and has no comments. The USEPA transmitted comments on the report in a letter dated June 17, 2003. Additional comments were received from the Science and Ecosystem Support Division (SESD) of the USEPA in an email dated July 14, 2003. Based on a previous discussion with you, revisions to the *Design Basis Report* are waiting on the completion of supplemental data gathering to optimize the PRB design (i.e., collection of additional groundwater data (see below), completion of an additional column test on site groundwater, and collection of aquifer porosity measurements).

The preliminary construction schedule included in Section 5 of the *Design Basis Report* currently indicates that construction is anticipated to commence in the summer of 2004. To facilitate construction, ArvinMeritor has contracted with the iron filings supplier and iron filings are being produced and delivered to the site. Production began in November 2003

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and is scheduled to continue until about July. ArvinMeritor is in the process of retaining a remedial contractor for construction of the PRB. A request for bids will be distributed in February 2004 with bids due in March. Once a contractor has been retained and a construction schedule is provided, that information will be transmitted to the agencies.

ArvinMeritor, on behalf of Grenada Mfg., obtained a permit from the US Army Corps of Engineers (USACOE) for construction of the PRB. Brown and Caldwell (BC) completed a wetlands survey for the project site and the findings were transmitted to the USACOE in August 2002. A Pre-Construction Notification for Nationwide Permit #38 was transmitted to the USACOE in September 2002. As a result of this application, the Mississippi Department of Archives and History requested the conduct of a cultural resources survey of the project site. The survey has been completed and the report was transmitted to the agencies in July 2003. In general, no cultural resources were identified within the project area. The permit was issued by the USACOE in August 2003.

The USACOE also requested wetlands mitigation for the site to address filling of a portion of the wetlands during construction of the PRB. ArvinMeritor prepared a Wetlands Mitigation Plan, which was transmitted to the agencies in March 2003.

At the request of the USEPA, ArvinMeritor also performed a field survey to verify two previous desktop reviews for threatened and endangered species. This field work has been completed and a letter was transmitted to the agencies in June 2003 reporting that no threatened or endangered species were identified in the area where the PRB is to be constructed.

The USEPA has requested specific performance monitoring requirements associated with the PRB. These requirements are addressed in the *Design Basis Report* for the PRB; specifically, in Appendix E Performance Monitoring Plan. Comments received from the USEPA on the *Design Basis Report* included revisions to the Performance Monitoring Plan. At the request of the USEPA, ArvinMeritor initiated the sampling efforts outlined in the Performance Monitoring Plan (with consideration given to the USEPA comments on the Plan). The initial efforts included installation of ten new groundwater monitoring wells, collection of site-wide groundwater samples, and collection of surface water and sediment samples from Riverdale Creek. A report summarizing this work is currently being prepared by BC. In addition, as required by the USEPA, quarterly surface water sampling will begin in February 2004.

In addition to the technical aspects of the PRB, there are active administrative efforts that ArvinMeritor is engaged in. ArvinMeritor successfully negotiated the purchase of the property on which a portion of the PRB will be constructed. ArvinMeritor is also negotiating a site license agreement with the technology patent holder for the iron filings PRB.

#### **Indoor Air Monitoring**

ArvinMeritor has performed indoor air monitoring at the Grenada Mfg. facility. This sampling was performed in February 2003, in accordance with the approved work plan. A

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report was transmitted to the agencies in April 2003. We are currently awaiting formal comments on the report.

#### **Chrome Destruct Pit and Chrome Plating Line Closures**

Closure of the Chrome Destruct Pit and the Chrome Plating Lines is complete. Clean closure was obtained at the Chrome Destruct Pit, but some impacted soil relating to the chrome plating lines remains in place. The USEPA felt that excavation of that soil might pose an increased health risk to Grenada Mfg. employees due to the likely presence of volatile organics in the groundwater under the building in the vicinity of the plating lines. Migration of chromium in groundwater will be addressed by installation of the PRB.

#### **Groundwater Monitoring at the Equalization Lagoon**

The Equalization Lagoon was previously closed by Textron and is currently in a RCRA monitoring program with the MDEQ. Grenada Mfg. has completed the required one year of quarterly sampling and has begun the semi-annual monitoring program in accordance with its permit.

#### **NAPL Recovery Efforts**

Recovery of both light and dense non-aqueous phase liquids (LNAPL and DNAPL) continues at the site on a monthly basis. NAPL recovery is ongoing in select wells in the vicinity of AOCs A and B, as well as from MW-2 near the Sludge Lagoon. NAPL recovery has been performed to date by Ferguson Harbour, Inc. under contract to ArvinMeritor.

We trust that this letter provides you with the necessary information regarding the status of activities at the Grenada Mfg. site. Please feel free to call us at (615) 255-2288 if you have any questions.

Sincerely,

BROWN AND CALDWELL



Dale R. Showers, P.E.  
Project Manager  
Environmental Services



Robert E. Ash IV, P.E.  
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cc: Louis Crawford, MDEQ  
Don Williams, Grenada Mfg.  
John Bozick, ArvinMeritor  
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